## LAWLER, METZGER, MILKMAN & KEENEY, LLC

2001 K STREET, NW SUITE 802 WASHINGTON, D.C. 20006

RUTH MILKMAN PHONE (202) 777-7726 PHONE (202) 777-7700 FACSIMILE (202) 777-7763

March 7, 2006

Via Electronic Filing

Monica Desai, Chief Consumer & Governmental Affairs Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Ex Parte Notice: Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities – CG Docket No. 03-123

Dear Ms. Desai:

On January 27, 2006, Hands On Video Relay Services, Inc. ("Hands On") filed an ex parte communication requesting that in any order adopting unbundling requirements for Video Relay Service ("VRS") providers, the FCC "temporarily waive the answer speed requirement for a period of 90 days after its decision." Consumers want both unbundling and acceptable speed of answer, however. Indeed, one of the reasons that consumers favor unbundling is their belief that unbundling will allow them to avoid long waiting times for outgoing calls. It would be a Pyrrhic victory for consumers to obtain unbundling only to have the FCC allow providers to extend waiting times by waiving speed-of-answer requirements. Hands On's proposal is contrary to the expressed interests of consumers and, therefore, should not be adopted by the Commission.

Email from George L. Lyon, Jr., counsel for Hands On, to Monica Desai, Jay Keithley and Thomas Chandler, FCC, CG Docket No. 03-123 (Jan. 27, 2006).

See, e.g., email from Ronald J. Sipek to the FCC, CC Docket No. 98-67 (Dec. 15, 2005); letter from Karen Peltz Strauss, Legal Consultant for Communication Service for the Deaf, Inc., to Marlene Dortch, FCC Secretary, CG Docket No. 03-123, Attachment at 1 (Jan. 25, 2006).

Monica Desai March 7, 2006 Page 2

Pursuant to the Commission's rules, this letter is being submitted for inclusion in the public record in the above-referenced proceeding.

Respectfully submitted,

/s/ Ruth Milkman
Ruth Milkman
Counsel for Sorenson Communications, Inc.

cc: Thomas Chandler
Jay Keithley
Marlene H. Dortch (via ECFS)